

**James McDonald**

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**From:** Heidi Buck [hbuck@rcolegal.com]  
**Sent:** Tuesday, March 06, 2012 8:13 PM  
**To:** james@jamesmcdonald.net  
**Subject:** RE: 1009111244 / McDONALD, JAMES B. / Our File No: 7523.50059

Mr. McDonald,

I think the discovery that has been completed is sufficient even as to the claims in the amended complaint, and therefore I do not wish to incorporate an extension of discovery deadlines into the current stipulation. I also believe that the trial date of June 4 is doable. Thanks for your consideration. I will move the court for an extension of just the dispositive motion cut off date.

Thanks,

- Heidi

**Heidi E. Buck**  
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Routh Crabtree Olsen, P.S.



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**From:** James McDonald [mailto:strathaar@comcast.net]  
**Sent:** Tuesday, March 06, 2012 11:43 AM  
**To:** Heidi Buck; james@jamesmcdonald.net  
**Cc:** Tommy Kwong  
**Subject:** RE: 1009111244 / McDONALD, JAMES B. / Our File No: 7523.50059

Miss Buck,

I have reviewed your stipulation and cannot support it as it is written. It would seem more logical to reset all respective dates rather than dispositive motions only as we have not conducted discovery or anything else based on the amended complaint. Let me know what your thoughts are.

James McDonald  
Cell phone: (425) 210-0614  
[james@jamesmcdonald.net](mailto:james@jamesmcdonald.net)

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**From:** Heidi Buck [mailto:hbuck@rcolegal.com]  
**Sent:** Monday, March 05, 2012 12:32 PM  
**To:** james@jamesmcdonald.net; strathaar@comcast.net  
**Cc:** Tommy Kwong  
**Subject:** 1009111244 / McDONALD, JAMES B. / Our File No: 7523.50059

Mr. McDonald,

Would you be willing to stipulate to adjusting the dispositive motion cut-off date from March 6, 2012 to April 13, 2012 in light of the court's recent allowance of your amended complaint?

3/11/2012

I don't believe such a stipulation would necessitate moving the trial date from the current June 4, 2012 date. If you are willing, please sign and return the attached draft stipulation or provide me your authorization to sign on your behalf. Upon receipt of the signed stipulation, I will add the noting date (we can file for same day consideration) and file with the court.

If you are unwilling to stipulate, please let me know as soon as possible.

Thank you,

**Heidi E. Buck**

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